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March 25, 2008

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ORIGINAL

*LIMITED TO MATTERS AND PROCEEDINGS
BEFORE FEDERAL COURTS AND AGENCIES

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **IT&E Overseas, Inc.**
Docket 96-45
2007 ETC Compliance Report

FILED/ACCEPTED

MAR 25 2008

Federal Communications Commission
Office of the Secretary

Dear Ms. Dortch :

IT&E Overseas, Inc. (IT&E), by its attorneys, hereby requests, pursuant to Sections 0.457(d) and 0.459 of the Commission's Rules, confidential treatment of the Service Quality Improvement Plan (Exhibit A) and the IT&E 2006 Expenditures (Exhibit C) in the IT&E 2007 ETC Compliance Report.

In support thereof, the following is shown:

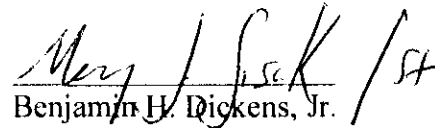
The information in Exhibits A and C concerns network planning and financial information for a competitive wireless carrier. As such, Exhibits A and C contain proprietary commercial, financial and technical data which is guarded from competitors and which is not released to the public. This information, which would otherwise not be released, is required to be submitted to the Commission in order for IT&E to maintain its ETC designation and receive federal universal service funds. The disclosure of this information could result in substantial competitive harm by disclosing IT&E's build out plans.

Accordingly, the information in Exhibits A and C should be accorded confidential treatment and not be made available to potential competitors.

2008-03-25 rec'd 044

In the event that the instant request is to be denied, we request advance notice of and a stay of the release of Exhibits A and C for public inspection, until such time as an Application for Review of the determination is resolved. Disclosure of this information prior to final adjudication would prejudice IT&E and render any successful appeal moot.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary J. Sisak / St".

Benjamin H. Dickens, Jr.

Mary J. Sisak

Attorneys for
IT&E Overseas, Inc.

Attachment

IT&E OVERSEAS, INC.
2007 ETC COMPLIANCE REPORT

CONTENTS

- Section 1: Five-year service quality improvement plan § 54.209 (a)(1)
- Section 2: Detailed Outage Information §54.209(a)(2)
- Section 3: Unfulfilled Service Requests §54.202(a)(3)
- Section 4: Customer Complaints §54.209(a)(4)
- Section 5: Service Quality and Consumer Protection Certification §54.209(a)(5)
- Section 6: Ability to Remain Functional in Emergencies Certification §54.209(a)(6)
- Section 7: Description of Carrier's Local Usage Plan §54.209(a)(7)
- Section 8: Equal Access Certification §54.209(a)(8)

Section 1: Five-year service quality improvement plan § 54.209 (a)(1)

IT&E's service quality improvement plan is to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service throughout its service area. As a wireless service provider, IT&E upgrades and replaces facilities and equipment as necessary. IT&E will use any high-cost universal service amounts received by it to offset expenditures incurred as it continues to upgrade and replace facilities and equipment. IT&E's service quality improvement plan is attached hereto as "Exhibit A."

In addition, the Federal Universal Service Support IT&E received in 2006 is attached hereto as "Exhibit B" and IT&E's 2006 expenditures related to the provision, maintenance, and upgrading of its facilities and services is attached as "Exhibit C."

Exhibit A and Exhibit C are submitted as confidential as they contain company specific financial data and network planning information, and disclosure of the information contained therein could jeopardize IT&E's financial and competitive position.

Section 2: Detailed Outage Information §54.209(a)(2)

During 2006, IT&E did not experience any service outages that affected at least 10% of its end users for a period lasting more than 30 minutes.

Section 3: Unfulfilled Service Requests §54.202(a)(3)

IT&E was able to provide service to all potential customers that requested service during 2006.

Section 4: Customer Complaints §54.209(a)(4)

During 2006, IT&E received an estimated 7 customer complaints per 1,000 lines.

IT&E Customer Complaints – 2006

Description	# of complaints
Wireless Airtime Dispute / Complaint	37
Wireless Miscellaneous	1
Wireless Monthly Recurring Charge Dispute/Complaint	131
TOTAL	169

Date	# of lines reported to USAC in 2006
03/31/06	25,049
06/30/06	23,950
09/30/06	24,741
12/31/06	25,200
Ave.	24,735

Number of customer complaints per 1,000 lines: 7

Section 5: Service Quality and Consumer Protection Certification §54.209(a)(5)

IT&E complies with applicable FCC service quality standards and consumer protection rules and those contained in the CTIA's Consumer Code for Wireless Service. See Exhibit D

Section 6: Ability to Remain Functional in Emergencies Certification §54.209(a)(6)

IT&E has fortified its network to remain functional in emergency situations. Standard network reliability features include battery back-up power at most facilities as well as generators installed at all switching facilities and 65% of its cell site locations. Further, IT&E has portable generators that can be deployed for sustained outages. In addition, IT&E's network reliability is supported by redundancy measures. See Exhibit D

Section 7: Description of Carrier's Local Usage Plan §54.209(a)(7)

See Exhibit D

Section 8: Equal Access Certification §54.209(a)(8)

See Exhibit D

IT&E 2006 High Cost Division Disbursements

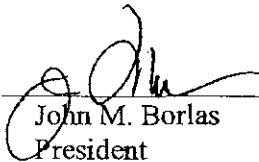
Year	Month	HCL	ICLS	Total
2006	Dec	\$130,407	\$150,256	\$280,663
2006	Nov	\$130,407	\$150,256	\$280,663
2006	Oct	\$128,670	\$150,256	\$278,926
2006	Sep	\$130,603	\$151,662	\$282,265
2006	Aug	\$130,603	\$151,662	\$282,265
2006	Jul	\$127,249	\$151,662	\$278,911
2006	Jun	\$127,737	\$139,703	\$267,440
2006	May	\$127,737	\$139,703	\$267,440
2006	Apr	\$119,043	\$139,703	\$258,746
2006	Mar	\$132,506	\$140,798	\$273,304
2006	Feb	\$132,506	\$140,798	\$273,304
2006	Jan	\$132,506	\$140,798	\$273,304
Annual Disbursement				\$3,297,231

RULE 54.209(a) (5), (6), (7), AND (8) CERTIFICATIONS

IT&E Overseas, Inc. (IT&E) hereby certifies that:

- a) it is complying with applicable service quality standards and consumer protection rules;
- b) it is able to function in emergency situations as set forth in Section 54.201(a)(2) of the rules;
- c) it is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service area; and
- d) it acknowledges that the Commission may require IT&E to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

This certification is made for the 2007 annual report.


By: 
John M. Borlas
President

Date: 3-13-08

DECLARATION UNDER PENALTY OF PERJURY

GUAM, U.S.A.)
)
Municipality of Tamuning)


I, John M. Borlas, President of IT&E Overseas, Inc., do hereby declare under penalty of perjury that the statements contained in the foregoing 2007 ETC Compliance Report are true and correct to the best of my knowledge, information and belief.



John M. Borlas
President
IT&E Overseas, Inc.

Dated: 3-13-08

Subscribed, Sworn to and acknowledged before me this 13th day of March, 2008.



Notary Public

DONNA M. PERRON
NOTARY PUBLIC
In and for Guam, U.S.A.
My Commission Expires: April 11, 2009
165 Marata St., #202, Tamuning, Guam 96913

